



Virgil W. Duffie, III, Senior Vice President, Chief Compliance Officer

June 20, 2012

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**VIA FEDERAL EXPRESS**

Ms. Marsha Adams  
U.S. Environmental Protection Agency  
Enforcement Services Section 1, SE-5J  
77 West Jackson Blvd.  
Chicago, IL 60604-3590

US EPA RECORDS CENTER REGION 5



434914

Re: Request for Information on Texas Township Drum Site in Kalamazoo,  
Michigan CERCLIS ID: MIN000510313

Dear Ms. Adams:

Attached please find the response of Safety-Kleen Systems, Inc. ("Safety-Kleen") to the above-referenced information request. Please note that Safety-Kleen also received information requests for the following entities who were dissolved in bankruptcy and whose assets were sold to Clean Harbors in 2003:

Safety-Kleen (Crowley), Inc.  
Safety-Kleen (PPM), Inc.  
Safety-Kleen (BDT), Inc.

As explained more fully in our response, Safety-Kleen maintained no documents related to these entities and therefore has no information responsive to the 104(e) information requests sent to those entities.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

Virgil W. Duffie, III  
Senior Vice President, Chief Compliance Officer

5360 Legacy Drive, Building 2, Suite 100  
Plano, TX 75024

PHONE 972.265.2051, FAX 972.265.2953, [chip.duffie@safety-kleen.com](mailto:chip.duffie@safety-kleen.com)



2008-01-08

**Response of Safety-Kleen Systems, Inc. 104(e) Request regarding  
Texas Township Drum Site in Kalamazoo, Michigan**

- i) Identify all persons consulted in the preparation of the answers to these Information Requests.

Answer:

Virgil W. Duffie, III  
Sr. VP and Chief Compliance Officer  
Environmental/Regulatory Compliance  
Safety-Kleen Systems, Inc.  
5360 Legacy Drive  
Bldg. 2, Ste. 100  
Plano, Texas 75024  
972/265-2051

Ben Smith  
Manager, Regulatory Programs  
Safety-Kleen Systems, Inc.  
1502 E. Villa Street  
Elgin, IL 60120  
847/468-6725

Dan Callaghan  
Director of Waste Services  
Safety-Kleen Systems, Inc.  
5360 Legacy Drive  
Bldg. 2, Ste. 100  
Plano, Texas 75024  
972/265-2884

John M. Robbins  
Transportation Manager  
Safety-Kleen Systems, Inc.  
5360 Legacy Drive  
Bldg. 2, Ste. 100  
Plano, Texas 75024  
972/265-2356

- ii) Identify all documents consulted, examined or referred to in the preparation of the answers to these Requests, and provide copies of all such documents.

Answer: Safety-Kleen Systems, Inc. has reviewed our master customer database, our master vendor database, and our current and historical purchasing system and has no responsive documents.

- iii) If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.

Answer: Safety-Kleen Systems, Inc. has no responsive documents.

- iv) Did you ever enter into an oral or written contract or otherwise do business with either Chemical Assistance, Inc. Environmental Network, Inc., or Donald Haugen for the purpose of arranging for the storage, treatment or disposal of waste materials? If you did, please identify the following:

- a. The persons with whom you or such other persons made such arrangements;
- b. The contact information for each persons with whom such arrangements were made;
- c. Every date on which such arrangements took place;
- d. For each transaction, the nature of the waste material or hazardous substance, included the chemical content, characteristics, physical state (e.g., solid, liquid) and the process for which the substance was used or the process which generated the substance;
- e. The owner of the waste materials or hazardous substances so accepted or transported;
- f. The quantity of the waste materials or hazardous substances involved (weight or volume) in each transaction and the total quantity for all transactions;
- g. All tests, analyses and analytical results concerning the waste materials;
- h. The person(s) who selected the Site as the place to which the waste materials or hazardous substances were to be transported;
- i. The amount paid in connection with each transaction, the method of payment and the identity of the person from whom payment was received;
- j. Where the person identified in g. above intended to have such hazardous substances or waste materials transported and all evidence of this intent;
- k. Whether the waste materials or hazardous substances involved in each transaction were transshipped through, or were stored or held at, any intermediate site prior to final treatment or disposal;

- l. The final disposition of each of the waste materials or hazardous substances involved in such transactions;
- m. The measures taken by you to determine the actual methods, means and site of treatment or disposal of the waste materials and hazardous substances involved in each transaction;
- n. The type and number of containers in which the waste materials or hazardous substances were contained when they were accepted for transport, and subsequently until they were deposited at the Site, and all marking on such containers;
- o. The price paid for (i) transport or (ii) disposal of (iii) or both, of each waste materials and hazardous substance;
- p. All documents containing information responsive to a)-p) above, or in lieu of identification of all relevant documents, provide copies of all such documents;
- q. All persons with knowledge, information of documents responsive to questions a through 9, above.

Answer: Safety-Kleen Systems, Inc. has no responsive documents. Safety-Kleen Systems, Inc. has no records of ever having done any business with Chemical Assistance, Inc. Environmental Network, Inc., or Donald Haugen.

As mentioned in the cover letter, Safety-Kleen also received 104(e) information requests for 3 former, now dissolved affiliates: Safety-Kleen (Crowley), Inc., Safety-Kleen (PPM), Inc. and Safety-Kleen (BDT), Inc. that were all originally part of the former Laidlaw Environmental Services, Inc. Chemical Services Division (collectively, "the CSD Entities").

By way of background and in order to more fully describe the complex corporate transactions and identity changes, it is necessary to start approximately 14 years ago. The CSD Entities were wholly-owned subsidiaries of Laidlaw Environmental Services, Inc. ("LESI"). On May 26, 1998, LESI completed the acquisition of the former Safety-Kleen Corp., a Wisconsin corporation. That acquired company subsequently changed its name to Safety-Kleen Systems, Inc. This is the entity on behalf of whom this response has been provided.

Effective July 1, 1998, LESI began doing business as the parent company Safety-Kleen Corp. LESI, now newly renamed Safety-Kleen Corp, was never an operating entity and never held a permit, managed waste or engaged in hazardous waste management operations. Each of the CSD Entities were operating companies previously owned by LESI. On June 9, 2000, Safety-Kleen Corp. and 73 of its domestic subsidiaries, including Safety-Kleen Systems, Inc., and the CSD Entities, filed voluntary petitions for reorganization under the Bankruptcy Code in Delaware.

On December 24, 2003, the Chapter 11 plan was consummated and Safety-Kleen Systems, Inc. emerged from bankruptcy as the operating company of the remaining assets. During this process, the CSD Entities were dissolved pursuant to a bankruptcy court order effective December 24, 2003. Also during the Chapter 11 proceedings, on February 22, 2002, the Safety-Kleen debtor companies entered into a definitive agreement with Clean Harbors, Inc. to sell most of the former LESI assets, including the Chemical Services Division (which included the CSD Entities). On June 18, 2002, the Bankruptcy Court approved the sale of the CSD to Clean Harbors. The sale of the Chemical Services Division closed on September 10, 2002 and was effective September 7, 2002.

Safety-Kleen Systems, Inc. is the entity that emerged from bankruptcy and is no longer affiliated with the now defunct CSD Entities, the assets and certain liabilities of which were sold in the bankruptcy to Clean Harbors. Thus, Safety-Kleen is not in possession or control of any records related to the CSD entities.

The Clean Harbors contact for information, if any, is as follows:

Clean Harbors, Inc.  
42 Longwater Drive  
Norwell, MA 02185-9048  
Attn: Michael R. McDonald